

Attorney for Plaintiff

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Defendant.

**JOINT STIPULATION REGARDING  
BRIEFING SCHEDULE FOR PLAINTIFF'S  
FEE MOTION; PROPOSED ORDER**

## JOINT STIPULATION

STIPULATION RE BRIEFING SCHEDULE  
17-CV-06557 JSC

1 anticipated motion for attorney's fees and costs in this Freedom of Information Act (FOIA) case.

2 The parties continue to work to resolve the fee issue and are hopeful that they will be able to  
3 resolve the issue during the first week of October 2018. Scheduling issues and the availability of  
4 necessary agency personnel make a resolution of this issue unlikely before early October. In the event  
5 that the parties are able to resolve the fee issue, they will inform the Court promptly.

6 The parties propose the following briefing schedule in the event that their discussions are not  
7 successful:

8 Nov. 1, 2018: Plaintiff's motion for attorney's fees and costs

9 Nov. 15, 2018: Defendant's opposition

10 Nov. 29, 2018: Plaintiff's reply

11 Dec. 6, 2018, 9 a.m.: Hearing on the motion

12 The parties respectfully request that the Court order the requested briefing schedule.

13 Dated: September 20, 2018

ALEX G. TSE  
United States Attorney

/s/ Robin M. Wall

Robin M. Wall  
Assistant United States Attorney  
Attorneys for Defendant  
U.S. Department of Justice

18 Dated: September 20, 2018

D. VICTORIA BARANETSKY

/s/ D. Victoria Baranetsky

D. Victoria Baranetsky  
Attorney for Plaintiff  
Center for Investigative Reporting

### 22 CERTIFICATION

23 Pursuant to Civil Local Rule 5-1(i)(3), the undersigned hereby attests that Victoria Baranetsky  
24 has concurred in the filing of this document.

25 Dated: September 20, 2018

ALEX G. TSE  
United States Attorney

/s/ Robin M. Wall

28 Robin M. Wall  
Assistant United States Attorney

**PROPOSED ORDER**

For good cause shown, the briefing schedule on plaintiff's anticipated motion for attorney's fees and costs shall be as follows with the parties' briefs due on or before the following dates and with the hearing at the date and time identified below:

Nov. 1, 2018: Plaintiff's motion for attorney's fees and costs

Nov. 15, 2018: Defendant's opposition

Nov. 29, 2018: Plaintiff's reply

Dec. 6, 2018, 9 a.m.: Hearing on the motion

SO ORDERED.

Dated: \_\_\_\_\_, 2018

\_\_\_\_\_  
HON. JACQUELINE SCOTT CORLEY  
United States Magistrate Judge